

1 Robert C. Weems (CA SBN 148156)  
WEEMS LAW OFFICES  
2 526 3rd St., Ste. A-2  
San Rafael, CA 94901  
3 Ph: 415.881.7653  
Fx: 866.610.1430  
4 *rcweems@weemslawoffices.com*

5 Attorneys for Plaintiff,  
SHELLY HALL  
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8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10 SHELLY HALL

11 Plaintiff,

12 v.

13 KILOLO KIJAKAZI, ACTING  
14 COMMISSIONER OF SOCIAL SECURITY,<sup>1</sup>

15 Defendant.  
16

Case 2:20-cv-02036-EFB

~~PROPOSED~~ ORDER AND  
STIPULATION RE: MODIFICATION  
OF SCHEDULING ORDER

17 Subject to the approval and any further orders of the Court, the parties, by and through  
18 counsel of record, stipulate and agree to Plaintiff's time to move for summary judgment under the  
19 scheduling order be extended from JULY 15, 2021 to **MONDAY, JULY 26, 2021**, with all other  
20 deadlines to follow as stated in the scheduling order; and further agree that the modification is  
21 supported by good cause, will not unduly delay resolution and is not prejudicial to either party.

22 The good cause supporting modification of the scheduling order includes that COVID-19's  
23 interruptions in the Social Security Administration's operations effecting the filing of certified  
24 administrative transcripts has resulted in concentration of filing deadlines in Plaintiff's counsel's  
25 active Social Security cases in the Northern and Eastern Districts of California which has interfered  
26 with Plaintiff's counsel able to fully analyze administrative transcripts, meet and confer with defense

27 <sup>1</sup> Under Fed. R. Civ. P. 25(d) when public officer who is a party in an official capacity dies, resigns,  
28 or otherwise ceases to hold office; the officer's successor is automatically substituted as a party. On  
Friday, July 9, 2021, Andrew Saul was terminated. Kilolo Kijakazi is Acting Commissioner.

1 counsel when possible grounds for voluntary remand are identified, and develop, prioritize and brief  
2 issues for summary judgment consistent with the professional standards of the Court and without  
3 prejudice to the Plaintiff. By modification of the scheduling order in this and other pending matters,  
4 Plaintiff's counsel believes the fewer additional scheduling order modifications will be necessary, the  
5 risk of missed deadlines will be reduced, and the Court's effective and efficient administration of  
6 justice served. This request for this modification of the scheduling order is made in good faith,  
7 without dilatory motive and not for purposes of undue delay or to prejudice the interest of any party.

8 SO STIPULATED AND AGREED, July 14, 2021:

9 For Plaintiff:

10 WEEMS LAW OFFICES

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12  
13 /s/Robert C. Weems

14 Robert C. Weems,  
15 Attorney for Plaintiff

For Defendant:

PHILLIP A. TALBERT

Acting United States Attorney

DEBORAH LEE STACHEL

Regional Chief Counsel, Region IX

SATHY OUM

Special Assistant U.S. Attorney

16 /s/Sathy Oum

17 SATHY OUM,  
18 Special Assistant United States Attorney  
19 and Attorney for the Defendant

20 **SO ORDERED.**

21 DATED: July 16, 2021.

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EDMUND F. BRENNAN  
U.S. MAGISTRATE JUDGE